

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----X	:
In re	: Chapter 9
	:
CITY OF DETROIT, MICHIGAN,	: Case No. 13-53846
	:
Debtor.	: Hon. Steven W. Rhodes
-----X	

**RESPONSE OF THE CITY OF DETROIT TO WAYNE  
COUNTY'S MOTION UNDER 11 U.S.C. § 105(d)(1) FOR A STATUS  
CONFERENCE ON, AND APPOINTMENT OF A FACILITATIVE  
MEDIATOR WITH RESPECT TO, ISSUES RELATED TO THE  
FUTURE OF THE DETROIT WATER AND SEWERAGE DEPARTMENT**

The City of Detroit (the "City") has participated in good faith in negotiations for the past several months with Wayne County, Oakland County and Macomb County regarding the possibility of creating a regional water/sewer authority. Those negotiations have not proven successful, and the City believes that they have run their course. Nevertheless, if the Court believes that mediation is appropriate, the City will, of course, abide by the Court's order.

Dated: April 11, 2014

/s/Heather Lennox

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

Bruce Bennett (CA 105430)

JONES DAY

555 South Flower Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

bbennett@jonesday.com

Jonathan S. Green (MI P33140)

Stephen S. LaPlante (MI P48063)

MILLER, CANFIELD, PADDOCK

AND STONE, P.L.C.

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 963-6420

Facsimile: (313) 496-7500

green@millercanfield.com

laplante@millercanfield.com

ATTORNEYS FOR THE CITY

### **Certificate of Service**

I, Heather Lennox, hereby certify that the foregoing *Response of the City of Detroit to Wayne County's Motion Under 11 U.S.C. § 105(d)(1) for a Status Conference on, and Appointment of a Facilitative Mediator with Respect to, Issues Related to the Future of the Detroit Water and Sewerage Department* was filed and served via the Court's electronic case filing and noticing system on this 11th day of April, 2014.